

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

MOTION FOR ADMISSION PRO HAC VICE

In re:

Von Ro Corporation

ch. 7 case no. 13-34910

Debtor,

Stephen J. Creasey, Trustee,

Plaintiff

vs.

Mark J. Mimbach, M.J. Mimbach, Inc.;
Spire Credit Union f.k.a Greater
Minnesota Credit Union,
and John Doe 1-x, ABC Corp,

adv. no. 14-03162

Affidavit of Movant

I, Samuel V. Calvert, an active member in good standing of the bar of the U.S. District Court for the District of Minnesota, request that this Court admit pro hac vice, Christopher LaNave who will be counsel for the defendants Mark J. Mimbach and MJ Mimbach, Inc. in the case listed above.

Check one of the following:

X I am a resident of the State of Minnesota, and agree to participate in the preparation and the presentation of the case above and accept service of all papers served as required by LR 83.5(d) (sign and complete information below).

___ I am not a resident of the State of Minnesota and hereby move for permission to act as local counsel under LR 83.5(d). I agree to participate in the preparation and the presentation of the case listed above, and accept service of all papers served as required by LR 83.5(d) should my motion for a non-resident to serve as local counsel be granted by the court (sign and complete information below and attach a completed Motion for

Permission for a Non-Resident to Serve as Local Counsel).

NOTE: Neither Mark Mimbach nor M. J. Mimbach Inc. have retained Sam Calvert or Christopher A. LaNave as of the date of this motion. If the motion is granted, then Mark Mimbach and M. J. Mimbach Inc. will retain Christopher A. LaNave as lead counsel and Sam Calvert as local counsel. Sam Calvert states that his involvement in this matter will be limited in scope according to the retainer agreement Sam Calvert will sign with Mark Mimbach and M. J. Mimbach Inc., which limited scope of local counsel for pro hac vice attorneys has been recognized in *Macawber Engineering, Inc. v. Robson & Miller*, 47 F.3d 253, 257 (8th Cir. 1995)

Signature: _____

Sam V. Calvert

Attorney License #: 1431X

Date: _____

3-4-15

Affidavit of Proposed Admittee

I, Christopher A. LaNave, am currently a member in good standing of the U.S. District Court for the Central District of California, but am not admitted to the bar of this court. I understand that if this Court grants me admission pro hac vice, the moving attorney identified in this motion must participate in the preparation and presentation of the case listed above, and must accept service of all papers served as required by LR 83.5(d). I further understand that the District of Minnesota is an electronic court and that I consent to service required by Fed. R. Civ. P. 77 by electronic means and I understand that electronic notice will be in lieu of service by mail unless the Court learns that a failure has occurred in which case service will be effected by mail within 24 hours.

Signature: _____



Date: _____

3/4/15

Typed Name: Christopher A. LaNave

Attorney License Number: 165340, issued by the State of CA.

Law Firm Name: Law Offices of Christopher A. LaNave

Law Firm Address: 501 W. St. Germain St. #300, St. Cloud, MN 56301

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Christopher A. LaNave

Attorney at Law

Licensed Only In California

March 2, 2015

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RE: In Re: Von Ro Corporation, Debtor, Stephen J. Creasey, Trustee, Plaintiff v. Mark J. Mimbach; et al, BKY. No.13-34910, ADV. No.14-03163

Dear Sir/Madam:

In addition to the Application for Admission Pro Hac Vice that is being submitted by Samuel V. Calvert, there are two items I wanted to address.

The first is that I am a resident of Minnesota. US District Court local rule 83.5 refers to admission of attorneys pro hac vice who are "Non-Resident(s)" of Minnesota. About five or so years ago, I applied for pro hac vice admission on a US District Court in Minnesota and advised that I was a resident of Minnesota. I was allowed to appear in that case, Murrins v. Fischer et al.07-1295.

The second is that I do not recall whether it came out in the case I testified in about 4 years or so ago, which Judge Kishel presided over so I am restating/stating it here. The state court judgment that was entered against me, which I appealed, was vacated by the district court judge who had entered the judgment prior to the appeal going to its conclusion.

If you have any questions please feel free to contact me.

Sincerely,

Christopher A. LaNave